

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

*In re Dealer Management Systems Antitrust
Litigation*, MDL 2817

*This document relates
to:* ALL ACTIONS

No. 1:18-CV-864

Hon. Robert M. Dow, Jr.

Magistrate Judge Jeffrey T. Gilbert

**STIPULATION AND [PROPOSED] ORDER RE: DEADLINES FOR MOTIONS TO
COMPEL CHALLENGING PRIVILEGE LOG ENTRIES**

The Dealership Class Plaintiffs (“Dealership Plaintiffs”), Vendor Class Plaintiff Loop, LLC, d/b/a AutoLoop (“AutoLoop”), Plaintiff Cox Automotive, Inc. (“Cox Automotive”), Plaintiff Authenticom, Inc. (“Authenticom”), Plaintiff Motor Vehicle Software Corp. (“MVSC”), Defendant CDK Global, LLC (“CDK”), and Defendant The Reynolds and Reynolds Company (“Reynolds”) (collectively, the “Parties”), by and through their undersigned counsel, jointly submit this Stipulation and proposed Order regarding the deadlines for motions to compel relating to privilege logs.

WHEREAS, on May 7, 2018, Judge Amy J. St. Eve entered a Case Management Order applicable to all cases pending in this Multidistrict Litigation (“MDL”). *See* Dkt. 166;

WHEREAS, the Case Management Order established the following deadlines:

Deadline for Non-Governmental Privilege Logs	November 2, 2018
Deadline for motions to compel, if any, challenging privilege entries after strict compliance with Local Rule 37.2	December 7, 2018
Responses to any motion to compel regarding privilege logs	14 days from date of motion
Replies in opposition to any motions to compel regarding privilege logs	7 days from filing of response

WHEREAS, pursuant to the Case Management Order, the parties exchanged privilege logs on November 2, 2018;

WHEREAS, following the exchange of privilege logs the parties have met and conferred, agreed that revised versions of certain privilege logs would be exchanged on December 5, 2018, and have exchanged such logs;

WHEREAS, the parties seek to allow sufficient time for review of the revised privilege logs, and for the meet and confer process and, if necessary, the briefing of motions relating to any potential issues relating to the revised logs; and

WHEREAS, the above-named Parties have reached the following stipulation with regard to the deadlines for filing and briefing motions to compel, if any, challenging privilege log entries:

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties that the deadlines for filing and briefing motions to compel, if any, challenging privilege log entries shall be as follows:

Deadline for motions to compel, if any, challenging privilege entries after strict compliance with Local Rule 37.2	January 14, 2019
Responses to any motion to compel regarding privilege logs	14 days from date of motion
Replies in opposition to any motions to compel regarding privilege logs	7 days from filing of response

STIPULATED AND AGREED:

Dated: December 7, 2018

/s/ Peggy J. Wedgworth
Peggy J. Wedgworth
Elizabeth McKenna
MILBERG TADLER PHILLIPS GROSSMAN LLP
One Pennsylvania Plaza, 19th Floor
New York, NY 10119
(212) 594-5300
pwedgworth@milberg.com
emckenna@milberg.com

Dealership Interim Lead Class Counsel

/s/ Britt M. Miller
Britt M. Miller
Matthew D. Provance
MAYER BROWN LLP
71 South Wacker Drive
Chicago, IL 60606
(312) 782-0600
bmiller@mayerbrown.com
mprovance@mayerbrown.com

Counsel for Defendant CDK Global, LLC

/s/ Derek T. Ho
Derek T. Ho
Michael N. Nemelka
KELLOGG, HANSEN, TODD, FIGEL
& FREDERICK, PLLC
1615 M Street, N.W., Suite 400
dho@kellogghansen.com
mnemelka@kellogghansen.com

*Counsel for Authenticom, Inc.; Cox
Automotive, Inc.; Loop, LLC, d/b/a AutoLoop
on behalf of itself and all others similarly
situated; and Motor Vehicle Software Corp.*

/s/ Leo D. Caseria
Leo D. Caseria
SHEPPARD MULLIN RICHTER & HAMPTON,
LLP
333 S. Hope St., 43rd Floor Los Angeles, CA
90071
(213) 617-4206
lcaseria@sheppardmullin.com

*Counsel for Defendant The Reynolds and Reynolds
Company*

SO ORDERED:

Hon. Robert M. Dow, Jr
UNITED STATES DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

I, Peggy J. Wedgworth, an attorney, hereby certify that on December 7, 2018, I caused a true and correct copy of the foregoing STIPULATION AND PROPOSED ORDER RE: DEADLINES FOR MOTIONS TO COMPEL CHALLENGING PRIVILEGE LOG ENTRIES to be filed and served electronically via the Court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Peggy J. Wedgworth

Peggy J. Wedgworth

MILBERG TADLER PHILLIPS GROSSMAN LLP

One Pennsylvania Plaza, 19th Floor

New York, NY 10119

(212) 594-5300

pwedgworth@milberg.com